

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN,
ADITYA HUMAD

Defendants.

No. 1:21-cr-10256-IT

GOVERNMENT’S PROPOSED VOIR DIRE

In addition to the Court’s customary questions of the venire, the United States respectfully requests that the Court ask prospective jurors the following voir dire questions:

1. This is a federal criminal case brought in the name of the United States of America. The Federal Government consists of many agencies and departments, including the Department of Justice, the United States Attorney’s Office, the Federal Bureau of Investigation (also known as the “FBI”), the Department of Health and Human Services (also known as “HHS”), the Department of Veterans Affairs (also known as the “VA”), the Veterans Health Administration (also known as “VHA”), and the Centers for Medicare and Medicaid Services (also known as “CMS”). Have you, a member of your family, or anyone close to you ever had any dealings with the Federal Government, including these entities, whether favorable or unfavorable, which might influence your consideration of the evidence in this case?

2. Witnesses in this case may include employees of the United States Department of Health and Human Services, the Federal Bureau of Investigation, the Department of Veterans Affairs, and the Centers for Medicare and Medicaid Services. Have you, a member of your family, or anyone close to you ever had any involvement, of any sort, with any of these agencies?

3. Do you have any views or reservations concerning law enforcement or the administration of criminal justice that would prevent you from rendering a fair and impartial verdict in this case?

4. Have you, a family member, or someone close to you had an experience, favorable or unfavorable, with a law enforcement official or with the criminal justice system which might influence your consideration of this case?

5. This is a criminal case involving, among other things, allegations that the defendants paid kickbacks to promote the use of medical devices by doctors. Do any of you hold any belief, feeling, or prejudice against these types of prosecutions such that you could not sit as a fair and impartial juror in this case?

6. Have any of you, or any member of your family, worked in the medical device industry?

7. Have you, a member of your family, or anyone close to you ever had any dealings with a medical device manufacturer that might influence your consideration of the evidence in this case?

8. This case specifically involves devices used in spinal surgeries. Have you, a member of your family, or anyone close to you ever had an experience with spinal surgery or spinal devices that might influence your consideration of the evidence in this case?

9. Have you read or heard anything about this case or about the defendants?

10. Have you discussed the charges in this case with anyone, or overheard such a discussion?

11. Do any of you have any personal knowledge of the facts of this case?

12. At the end of the case, the jurors will be asked to deliberate and decide, unanimously, whether the Defendant is guilty or not guilty. Some people, for religious or other reasons, think that one person should not sit in judgment of another person. Do you have any beliefs or strong feelings that will make it difficult for you to sit in judgment and reach a verdict in this case?

13. At the end of the case, the Court will instruct you on the law you are to apply. Jurors are obligated to follow the law as told to them by the Court. Do you have any concerns that you might not be able to follow the law, as instructed by the Court, if you do not agree with the law or the legal principles that the Court tells you to apply?

14. The purpose of all these questions is to collect information about the prospective jurors so the Court and parties pick a fair and impartial jury. Do you have any other beliefs or views that could make it difficult for you to render a fair verdict in this case?

15. Is there anything else about you, your family, background, work, life experiences, or beliefs, that you think the parties should know which might help them pick a fair and impartial jury?

LEAH B. FOLEY
United States Attorney

/s/ Chris Looney
ABRAHAM R. GEORGE
CHRISTOPHER LOONEY
MACKENZIE A. QUEENIN
Assistant U.S. Attorneys
1 Courthouse Way
John Joseph Moakley U.S. Courthouse
Boston, MA 02210
(617) 748-3100

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused this document to be filed through the ECF system on February 18, 2025.

/s/ Chris Looney
CHRISTOPHER LOONEY